

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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STUART E. STEINBERG, Individually and as Special Case No. 24-CV-4999-ENV-SJB  
Administrator of the ESTATE OF MAX D.  
STEINBERG, EVIE R. STEINBERG, PAIGE P. TEREN Served on Defendants' U.S.  
and JAKE R. STEINBERG, Counsel on October 16, 2024  
Plaintiffs,

-against-

QATAR CHARITY; QATAR NATIONAL BANK and  
MASRAF AL RAYAN,  
Defendants.

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**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER  
AUTHORIZING SERVICE OF PROCESS PURSUANT TO FED. R. CIV. P. 4(f)(3)  
OR, ALTERNATIVELY, FOR ISSUANCE OF LETTERS ROGATORY**

**PLEASE TAKE NOTICE** that, for the purpose of effectuating service of process upon Defendants Qatar Charity, Qatar National Bank, and Masraf Al Rayan, Plaintiffs through their undersigned counsel, on a date and at a time to be designated by the Court, will move this Court before the Hon. Eric N. Vitaliano, 225 Cadman Plaza East, Brooklyn, New York 11201 upon the accompanying Memorandum of Law and the Declaration of Patrick L. Rocco executed on October 16, 2024, together with all exhibits thereto, and all prior pleadings and proceedings had herein, to enter:

(1) an order pursuant to Federal Rule of Civil Procedure 4(f)(3) authorizing Plaintiffs to serve the Summons and Complaint on Defendants by delivering same, together with Arabic translations thereof, via electronic mail sent to the counsel of record for the Defendants in two related cases currently pending in this District at their e-mail addresses for receipt of notices of electronic filing in those two cases, as follows: (a) for Defendant Qatar Charity, the following attorneys affiliated with DLA Piper LLP US: John M. Hillebrecht ([john.hillebrecht@dlapiper.com](mailto:john.hillebrecht@dlapiper.com)) and Michael George Lewis ([michael.lewis@dlapiper.com](mailto:michael.lewis@dlapiper.com)); (b) for Defendant Qatar National Bank, the following attorneys affiliated with Ropes & Gray

LLP: Douglas H. Hallward-Driemeier ([douglas.hallward-driemeier@ropesgray.com](mailto:douglas.hallward-driemeier@ropesgray.com)) and Michael G. McGovern ([michael.mcgovern@ropesgray.com](mailto:michael.mcgovern@ropesgray.com), and (c) for Defendant Masraf Al Rayan, Carolina A. Fornos of Pillsbury Winthrop Shaw Pittman LLP ([Carolina.fornos@pillsburylaw.com](mailto:Carolina.fornos@pillsburylaw.com)) (collectively, “Defendants’ U.S. Counsel”); or, in the alternative,

(2) on order pursuant to 28 U.S.C. § 1781 and Federal Rule of Civil Procedure 4(f)(2)(B) issuing the Letters Rogatory submitted as Exhibits 7-9 to the accompanying Declaration of Patrick L. Rocco, and directing the Clerk of Court to prepare exemplified copies of all documents to be served via said Letters Rogatory, specifically three exemplified copies of the Complaint filed on July 18, 2024 [Docket Entry (“DE”) 1] and the Summon issued on July 19, 2024 to Qatar Charity, Qatar National Bank, and Masraf Al Rayan [DE 6]; and/or,

(3) an order granting such other and further relief as the Court deems just and proper.

Please take further notice that pursuant to the minute order entered on October 11, 2024, Defendants’ opposition to the relief requested herein must be served upon Plaintiffs’ undersigned counsel via e-mail by no later than October 30, 2024, and Plaintiffs’ reply in further support of this motion must be served upon Defendants’ U.S. Counsel via e-mail by no later than November 6, 2024.

Dated: October 16, 2024

Respectfully submitted,

/s/ Patrick L. Rocco  
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